

## Flores, Priscilla (Feliciano)

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**From:** Davidj Gray <gray.davidj@epamail.epa.gov>  
**Sent:** Wednesday, September 24, 2014 11:57 AM  
**To:** Gray, Davidj  
**Subject:** Fw: Questions-Taunton

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David J. Gray, P.E.  
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----- Forwarded by Davidj Gray/R1/USEPA/US on 09/24/2014 11:56 AM -----

From: Davidj Gray/R1/USEPA/US  
To: Joe Bucci Jr. <joe.buccijr@americanrocksalt.com>  
Date: 08/29/2012 03:48 PM  
Subject: Re: Questions-Taunton

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Hi Joe,

I have responded to your questions in-line below.

Regards,

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David J. Gray, P.E.  
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▼ Joe Bucci Jr. ---08/27/2012 08:08:16 AM---Hi David, Sorry for the phone tag the last couple of weeks. I left you a message the other day stati

From: Joe Bucci Jr. <joe.buccijr@americanrocksalt.com>  
To: Davidj Gray/R1/USEPA/US@EPA  
Date: 08/27/2012 08:08 AM  
Subject: Questions-Taunton

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Hi David,

Sorry for the phone tag the last couple of weeks. I left you a message the other day stating that I would email you some questions regarding the Taunton site. They are below:

1. Do some facilities that require a permit "fly under the radar", similar to the Taunton facility, until a complaint or incident occurs?

Yes, that is possible.

2. How are sampling requirements determined for the MSGP?

They are defined in the permit for each specific sector and by any receiving water impairments. EPA may also require additional sampling requirements on a case-by-case basis.

3. Do all salt pile stockpile sites require a NPDES permit, even those where storm water is properly contained and controlled on site (infiltrates into the groundwater and/or evaporates in settling ponds). Stand alone salt storage facilities themselves are not categorically required to obtain NPDES permit coverage under our industrial program. Furthermore, no NPDES permit is required where there exists no discharge of pollutants to a surface water. However, if a facility operator engages in a regulated industrial activity that results in related stormwater discharges to a surface waterbody, it is required to comply with the Part 2.1.2.7 of the MSGP Permit (see excerpt below) if it also operates a salt pile at the site. It is not clear whether or not the Taunton facility engages in a categorically regulated industrial activity; the facility sought coverage under Sector AD which is reserved for facilities designated by EPA for permit coverage due to the significance of the stormwater discharges.

4. Is groundwater contamination an issue? Must there be an impermeable pad and lined retention basin, or is infiltration into GW acceptable. From what I have been told by the LSP, groundwater infiltration is not an issue at the Taunton site since the groundwater is recognized as a GW3 and non-potable resource by MassDEP.

Groundwater contamination is certainly a concern, however, the MSGP does not require an impermeable pad or lined retention basin. Rather, the MSGP addresses exposure of pile and therefore limits the potential for leaching into the ground along with runoff to surface waters. MassDEP does restrict salt pile storage in Water Supply Protection Areas under [Massachusetts General Law Chapter 85, section 7A](#). The Drinking Water Regulations, 310 CMR 22.21(2)(b), also restrict deicing chemical storage within wellhead protection areas (Zone I and Zone II) for public water supply wells, as follows: "storage of sodium chloride, chemically treated abrasives or other chemicals used for the removal of ice and snow on roads [are prohibited], unless such storage is within a structure designed to prevent the generation and escape of contaminated runoff or leachate." For drinking water reservoirs, 310 CMR 22.20C prohibits, through local bylaw, uncovered or uncontained storage of road or parking lot de-icing and sanding materials within Zone A at new reservoirs and at those reservoirs increasing their withdrawals under MGL Chapter 21G, the Water Management Act.

5. Is there a chance that chlorides or solids monitoring will be required in the future?

EPA may add additional monitoring parameters as appropriate at any time upon notice.

6. Does MassDEP have any regulatory responsibilities of oversight when it comes to storm water control or the MSGP for the site?

MassDEP has certified EPA's MSGP and added conditions that it may enforce related to new and redeveloped facilities, submission of monitoring data, the authority to inspect sites. See also response to Number 4.

7. Are there any new or pending regulations that could be more restrictive for the operation of a bulk salt storage facility?

I'm not aware of any.

#### Excerpt of 2008 MSGP

**2.1.2.7 Salt Storage Piles or Piles Containing Salt.** You must enclose or cover storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces. You must implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Piles do not need to be enclosed or covered if stormwater runoff from the piles is not discharged or if discharges from the piles are authorized under another NPDES permit.

Thank for taking the time to look this over. Any help is greatly appreciated. Let me know if you have any questions. Thanks and have a great week!

Regards,

Joe

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